

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**THE HONORABLE BARBARA J.
HOUSER (RET.) IN HER CAPACITY
AS TRUSTEE OF THE BSA
SETTLEMENT TRUST,**

Plaintiff,

v.

**ALLIANZ GLOBAL RISKS US
INSURANCE COMPANY, *et al.*,**

Defendants.

Civil Action No. 3:23-cv-01592-S

**DEFENDANTS GREAT AMERICAN ASSURANCE COMPANY, GREAT AMERICAN
E&S INSURANCE COMPANY, GREAT AMERICAN INSURANCE COMPANY, ARCH
INSURANCE COMPANY, ARROWOOD INDEMNITY COMPANY, AXIS SPECIALTY
INSURANCE COMPANY, AXIS SURPLUS INSURANCE COMPANY, CONTINENTAL
INSURANCE COMPANY, ENDURANCE AMERICAN SPECIALTY COMPANY,
ENDURANCE AMERICAN INSURANCE COMPANY, EVEREST NATIONAL
INSURANCE COMPANY, GENERAL STAR INDEMNITY COMPANY, SWISS RE.
CORPORATE SOLUTIONS CAPACITY INSURANCE CORPORATION, AND
WESTPORT INSURANCE CORPORATION'S MOTION TO DISMISS
PURSUANT TO FED. R. CIV. P. 12(B)(1) AND 12(B)(6)**

Defendants Great American Assurance Company; Great American E&S Insurance
Company; Great American Insurance Company; Arch Insurance Company; Arrowood Indemnity
Company, formerly known as Royal Insurance Company of America; Axis Specialty Insurance
Company; Axis Surplus Insurance Company; The Continental Insurance Company, on its own
behalf and as successor to Niagara Fire Insurance Company; Endurance American Specialty
Company; Endurance American Insurance Company; Everest National Insurance Company;
General Star Indemnity Company; Swiss Re. Corporate Solutions Capacity Insurance
Corporation (formerly known as First Specialty Insurance Corporation); and Westport Insurance

Corporation hereby respectfully move to dismiss plaintiff's complaint pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6). The points and authorities in support of this motion are set forth in the accompanying brief in support.

Dated: October 6, 2023

Respectfully submitted,

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By: /s/ David Schubert

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CERTIFICATE OF SERVICE

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/s/ Kimberly Steele